

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BEVERLY V. WILLIAMS	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KYW-TV	:	
and	:	
CBS CORPORATION	:	
and	:	
VIACOM, INC.	:	NO. 02-3183
	:	
Defendants.	:	

ORDER

AND NOW, this ____ day of _____, 2002, after consideration of the Defendants' motion for admission of Bettina B. Plevan, Esquire, as counsel pro hac vice for purposes of this case, IT IS HEREBY ORDERED that the Motion is GRANTED, and that Bettina B. Plevan, Esquire, is hereby admitted as counsel pro hac vice for Defendants and is hereby permitted to appear and participate on behalf of Defendants in this action pursuant to the provisions of Local Rule 83.5.2.

Eduardo C. Robreno, J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BEVERLY V. WILLIAMS	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KYW-TV	:	
and	:	
CBS CORPORATION	:	
and	:	
VIACOM, INC.	:	NO. 02-3183
	:	
Defendants.	:	

DEFENDANTS' MOTION FOR ADMISSION OF COUNSEL
PRO HAC VICE

Pursuant to Local Rule of Civil Procedure 83.5.2 of the United States District Court for the Eastern District of Pennsylvania, Defendants hereby move the Court for an Order granting leave to Bettina B. Plevan, Esquire, of Proskauer Rose LLP, New York, New York, to be admitted as counsel pro hac vice for Defendants in this action. In support of their Motion, Defendants submit the attached Memorandum.

Respectfully Submitted,

Vernon L. Francis
Michael E. Baughman
Dechert Price & Rhoads
4000 Bell Atlantic Tower
1717 Arch Street
Philadelphia, PA 19103
(215) 994-4000

Attorneys for Defendants

Dated: May 29, 2002

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BEVERLY V. WILLIAMS	:	CIVIL ACTION
	:	
Plaintiff,	:	
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v.	:	
	:	
KYW-TV	:	
and	:	
CBS CORPORATION	:	
and	:	
VIACOM, INC.	:	NO. 02-3183
	:	
Defendants.	:	

**MEMORANDUM IN SUPPORT OF DEFENDANTS'
MOTION FOR ADMISSION OF COUNSEL
PRO HAC VICE**

Pursuant to Rule 83.5.2 of the Local Rules of Civil Procedure for the United States District Court for the Eastern District of Pennsylvania, Defendants respectfully request that this Court enter an Order granting leave to Bettina B. Plevan, Esquire, of Proskauer Rose LLP, New York, New York, to be admitted as counsel pro hac vice for Defendants in this Action. In support of their Motion, Defendants aver as follows:

1. Defendants have retained Ms. Plevan of the law firm of Proskauer Rose LLP, in New York, New York, to act as counsel in this matter. Defendants have further engaged Dechert Price & Rhoads of Philadelphia, Pennsylvania to appear as associate counsel.
2. Prior to removal, Ms. Plevan had been admitted pro hac vice in the Court of Common Pleas, Philadelphia County, to act as counsel for Defendants.

3. Ms. Plevan has been a member in good standing with the Bar of the State of New York since 1971. She is admitted to practice law in the courts of New York as well as the Supreme Court of the United States, the United States Courts of Appeals for the District of Columbia, Second, Third, Fourth, Fifth, Ninth, and Eleventh Circuits, and the United States District Courts for the Northern, Southern and Eastern Districts of New York.

4. The admission pro hac vice of Ms. Plevan will promote the just, speedy, efficient and fair determination of this matter.

5. Vernon L. Francis and Michael E. Baughman of Dechert Price & Rhoads shall serve as associate counsel to the admittee in accordance with Local Rule 83.5.2.

WHEREFORE, Defendants respectfully request that Bettina B. Plevan, Esquire, be admitted pro hac vice as counsel for Defendants in this Action.

Respectfully Submitted,

Vernon L. Francis
Michael E. Baughman
Dechert Price & Rhoads
4000 Bell Atlantic Tower
1717 Arch Street
Philadelphia, PA 19103
(215) 994-4000

Attorneys for Defendants

Dated: May 29, 2002

CERTIFICATE OF SERVICE

I, Michael E. Baughman, hereby certify that I caused to be served on May 29, 2002, a true and correct copy of the Motion for Admission Pro Hac Vice by hand delivery upon the following:

Patricia P. Pierce, Esquire
Willig Williams & Davidson
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103

Alice Ballard, Esquire
225 South 15th Street
Suite 1700
Philadelphia, PA 19102

Attorneys for Plaintiffs

Michael E. Baughman